

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

LIBERTY MEDIA HOLDINGS, LLC  
Plaintiff,  
vs.  
SERGEJ LETYAGIN d/b/a  
SUNPORN.COM, IDEAL CONSULT,  
LTD., "ADVERT", "CASTA",  
"TRIKSTER", "WORKER", "LIKIS",  
"TESTER" and DOES 1-50  
Defendants

Case No. 12-cv-00923-LRH-GWF

**DECLARATION OF ERIKA DILLON IN  
SUPPORT OF REPLY TO DEFENDANT  
LETYAGIN AND IDEAL CONSULT,  
LTD.'S OPPOSITION TO PLAINTIFF'S  
MOTION FOR LEAVE TO CONDUCT  
IMMEDIATE DISCOVERY**

I, ERIKA DILLON, being over 18 years of age, having personal knowledge of the facts set forth herein, and being competent to testify to the same if called to do so at trial, state as follows:

1. I am a resident of the state of Nevada and am employed as an in-house paralegal and online investigator by Liberty Media Holdings, LLC.

2. Beginning in September of 2011, I conducted extensive research attempting to determine the true and correct locations of Ideal Consult, Ltd. and Sergej Letyagin, as well as any other information that might assist in effecting service of process (including research into multiple email addresses utilized by Letyagin and Ideal).

1           3.       Throughout the course of my research, multiple addresses were found. While we  
2 attempted to communicate with Defendants at several of these addresses, none of our attempts at  
3 correspondence were ever responded to, save for their U.S. attorneys responding to inform  
4 Liberty that they refused to accept service of process.

5           4.       On September 27, 2011, the WHOIS registry information for sunporno.com listed  
6 the registrant contact information as “Moniker Privacy Services, 20 SW 27th Ave., Suite 201,  
7 Pompano Beach, FL 33069.” This was the address of a company that provides website  
8 registrants with privacy protection, not the address of Letyagin or Ideal.

9           5.       On September 28, 2011, the WHOIS registry information for sunporno.com listed  
10 the registrant contact information as “Ideal Consult Ltd, offices of Mayfair Trust Group Limited,  
11 Independence Avenue, P.O. Box 1312, Capital City, Victoria, Mahe, 00000, SC.” On December  
12 9, 2011, Liberty sent a waiver of service package to this address. While the package was  
13 confirmed as delivered by UPS, we never received any response from Ideal Consult, Ltd., nor  
14 any indication that such a package was actually received there by any Defendant.

15           6.       On November 8, 2011, I recorded the WHOIS registry information for the website  
16 gorgeouspeople.com. This website listed the registrant contact information as “Sergei Letyagin,  
17 [webmaster@nightangel.com](mailto:webmaster@nightangel.com), na, 6/7/r, v. Verdi, Florence, Italy, IT 392020.” This does not  
18 appear to be an actual address anywhere in Florence.

19           7.       On November 8, 2011, I also recorded the WHOIS registry information for the  
20 website twilightsex.org. This website listed the registrant contact information as “Serge Orlov,  
21 [webmaster@nightangel.com](mailto:webmaster@nightangel.com), Dorferstrasse, 700/1-3120, Vienna, Austria, 829302, AT.”

22           8.       On December 4, 2011, I located information that indicated Sergej Letyagin was  
23 tied to a company called “Sky Alliance Group, Inc.”. This company listed its address as “Second  
24 Floor, Independence Ave, P.O. Box 1312, Capital City, Seychelles.” On December 9, 2011,  
25 Liberty sent a waiver of service package to this address. While the package was confirmed as  
26 delivered by UPS, we never received any response from Letyagin nor from Sky Alliance Group,  
27 Inc., nor any indication that such a package was actually received there by any Defendant.

10. Archival WHOIS information revealed that the website sunpornolive.com was registered by Sergej Letyagin on June 9, 2010 and previously listed the following registrant information: “Sergej Letyagin, [webmaster@nightangel.com](mailto:webmaster@nightangel.com), Portland House, Suite 2, Glasis Road, gi, 00000, GI.” On December 9, 2011, Liberty sent a waiver of service package to this address. While the package was confirmed as delivered by UPS, we never received any response from Letyagin, nor any indication that such a package was actually received there by any Defendant.

11. Based on the number of addresses that were able to be located for Letyagin, the fact that they span several countries, and a lack of response from any mailings, it appeared that we had not managed to locate any true and correct addresses for these defendants. It was impossible to know which of the many (if any) addresses were correct.

12. However, based upon information and other evidence, I contacted an investigator in Prague via Skype on December 30, 2011. During our conversation, the investigator said that he could not reliably confirm if Letyagin lived at the Prague address we had located.

I hereby certify that the foregoing is true and correct to the best of my knowledge, sworn under the penalties of perjury under the laws of the United States.

Dated this 18<sup>th</sup> day of July, 2012 in Las Vegas, Nevada.

3